

RESPONSES TO COMMENTS ON THE FEBRUARY 10, 2021 PRELIMINARY DRAFT FY22 WORK PLAN

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Responses to Comments

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2	1.01	Written Comment	Bob Godfrey (Marina Del Rey Anglers)	Add acronyms' CCA - Coastal Conservation Assn. of California HSWRI - Hubbs Sea World Research Institute KHOEP - King Harbor Ocean Enhancement Program	Comment noted. The FY22 Work Plan is consistent with the Actions identified in the Comprehensive Conservation and Management Plan (CCMP) Action Plan adopted by the Governing Board in October 2018. The drafting of the CCMP Action Plan went through an iterative year-long public process that included numerous public stakeholder meetings and workshops. At this time, the Santa Monica Bay National Estuary Program (NEP) is not further revising the CCMP Action Plan. We will retain your suggestion for consideration in the next update of the CCMP. See also Actions #4 and #13 for restoration actions that may benefit halibut.

CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
2	1.02	Written Comment	Bob Godfrey (Marina Del Rey Anglers)	Due to the striking similarity of the halibut restoration to the abalone restoration we suggest the following be added to Item #2. HSWRI and DFW are spawning rearing and releasing halibut in Mission Bay. MDRA has provided brood stock and collaborated in spawning halibut at the Carlsbad Fish Hatchery. MDRA has been active with the Ocean Research Enhancement Hatchery Program for many years. We plan on transitioning our existing fish pens over to rearing halibut as soon as possible. MDRA has the funds and volunteers to make this happen. The following is formatted to be consistent with and complementary to the existing text.	See response to comment 1.01.
2	1.03	Written Comment	Steve Santen (Marina Del Rey Anglers)	CCMP Action: Recover Halibut Populations in SM Bay New CCMP Next Step: Support Aquaculture Facility for Halibut Lead: MDRA, KHOEP Partners: LACDBH , HSWRI, CDFW Objectives: Perfect captive spawning and rearing of Halibut. Description: Conduct Habitat sustainability survey for released fish Outputs: Release Halibut into SM Bay Long-term Outcomes: Sustainable fishery as measured by monitoring	See response to comment 1.01.

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2	1.04	Written Comment	Steve Santen (Marina Del Rey Anglers)	Add acronyms' CCA - Coastal Conservation Assn. of California HSWRI - Hubbs Sea World Research Institute KHOEP - King Harbor Ocean Enhancement Program	See response to comment 1.01.
2	1.05	Written Comment	Thomas Parker (Los Angeles County Sanitation Districts)	Action 2 – Recommend including OPC and/or UCI as partners and project descriptions for collaborations at hand (OPCs interim kelp action plan, etc.)	Comment incorporated into Action #2, Next Step #1: Ocean Protection Council (OPC) was added under "Partner(s)".
2	1.06	Workshop (Breakout Summary)	Group 2	Green infrastructure and resiliency • include partnership with OPC in project #2 [Restore kelp forests in the Bay to improve the extent and condition of the habitat]	See response to comment 1.05.
2	1.07	Workshop (Breakout Summary)	Group 4	Marine Projects • Kelp initiatives – Kelp anchor establishment should be prioritized for Santa Monica Bay to protect the coastline	Comment noted. The FY22 Work Plan includes kelp restoration actions to mitigate impacts and increase resiliency to climate change. Action #2 involves restoring kelp forests to improve habitat functions, local fisheries, and coastal resilience. Also, Action #5 involves implementation of offshore artificial reefs, which has many benefits including increased kelp habitat.

CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
2	1.08	Workshop (Breakout Summary)	Group 4	Collaboration with Ocean Protection Council – opportunity for collaboration with OPC regarding their work on urchin culling and kelp monitoring	See response to comment 1.05
3	2.01	Workshop (Breakout Summary)	Group 4	Marine Projects • Abalone restoration – this project is similar to the halibut-related project; suggestion that both projects be put under the same heading in the work plan	See response to comment 1.01.
6	3.01	Workshop (Breakout Summary)	Group 1	SUGGESTIONS FOR FY22 WORK PLAN TO MITIGATE IMPACTS AND INCREASE RESILIENCY TO CLIMATE CHANGE • Dune restoration project are great for wave run-up (co-benefit: improves wildlife habitat)	Comment noted. The FY22 Work Plan includes Action #6, which involves restoring coastal strand and dune habitats to improve ecological function, increase coastal resilience, and provide habitat for rare species.
6	3.02	Workshop (Breakout Summary)	Group 5	• Beach Characterization Study –Folks would be interested in learning about the results of this study. Is now the right time to convene a meeting to share results of the study?	Comment noted. This study will have results drafted after summer 2021, with the intention of being included in the next State of the Bay Report and a future manuscript. The lead scientists would be happy to present at a future date.

CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
9	4.01	Workshop (Breakout Summary)	Group 4	Marine Projects • Item 9: [Implement Malibu Creek Ecosystem Restoration Project (Rindge Dam and other barrier removals) to support ecosystem restoration] – debris from the dam removal could be used as reef material, or put to other environmentally beneficial use	Comment incorporated into Action #2, Next Step #3: "Develop[ment of] recommendations for the deposition of materials from Rindge Dam or other suitable sources to augment sediment supply" was included as part of the FY22 Work Plan.
11	5.01	Workshop (Breakout Summary)	Group 2	Green infrastructure and resiliency • Kelp restoration; use daylighting streams for stormwater management	Comment noted. The FY22 Work Plan includes actions to restore kelp and daylight streams in order to mitigate impacts and increase resiliency to climate change. Action #2 involves restoring kelp forests to improve habitat functions, local fisheries, and coastal resilience. Action #11 involves identifying and prioritizing additional urban streams for restoration, including by daylighting culverted streams.

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13	6.01	Written Comment	Kathy Knight (Ballona Ecosystem Education Project)	3. We need to build consensus on the proposed Restoration of the Ballona Wetlands.	Comment noted. The lead agency for the Ballona Wetlands Restoration Project is California Department of Fish & Wildlife (CDFW) and issues raised by stakeholders and the general public have been addressed primarily through the EIR process. Staff recognize and appreciate the multitude of perspectives surrounding the complex issues facing the Ballona Wetlands Ecological Reserve. Additional comments on the EIR should be directed to CDFW.
13	6.02	Written Comment	Kathy Knight (Ballona Ecosystem Education Project)	4. The EIR for the Ballona Wetlands Ecological Reserve was done by the Bay Foundation. The Bay Foundation has a private interest in having restored kelp beds in Santa Monica Bay. It should not have private interests or connection to the project if it is going to do an EIR for a public reserve.	See response to comment 6.01.

13	6.03	Written Comment	Kathy Knight (Ballona Ecosystem Education Project)	<p>5. A lot of issues regarding the BWER were raised at the meeting that have not been addressed. When are they going to be addressed?</p> <p>Such as:</p> <p>a. No alternative studied in the EIR to restore the Ballona Wetlands to the mostly fresh water wetland that it has been for at least 400 years.</p> <p>Only changing it into a mostly salt water bay was studied.</p> <p>b. No hydrology report was done on the site. No restoration plans should be approved until a hydrology study is done.</p> <p>c. Impact of sea level rise on Ballona, and salt water intrusion from the proposed restoration plan that could invade 3 fresh water aquifers that need very much to be protected, due to the Los Angeles area already not having enough fresh drinking water for its population.</p> <p>d. Access to the reserve has been denied to the groups and citizens that fought for so many years to get this land saved. They fought for over 30 years to educate the public about the importance of the wetlands and the need to save it. Due to their efforts a large extension of the Playa Vista project was stopped west of Lincoln. Playa Vista sold it to the state government</p>	<p>Comment noted. For comments indicated as 5a, 5b, and 5c by the commenter, see response to comment 6.01 and 6.13. For comment indicated as 5d by the commenter, access to and on-site project implementation at the Ballona Wetlands Ecological Reserve is determined and granted by the land managers, CDFW. Existing public events (prior to COVID-19 restrictions) happened frequently on site and staff encourage participation in events held by Audubon, Friends of Ballona Wetlands, and TBF, once events resume. Public access is evaluated extensively in the Ballona EIR. Please see also the CDFW October 7, 2020 Memo to Commission Governing Board Chair (page A2-59 of this document).</p>
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				of California. Despite all this work these citizens are not being allowed on the land to do stewardship and give educational tours for the public. They deserve the opportunity to do this. When can they have it?	

13	6.04	Written Comment	Patricia McPherson (Grassroots Coalition)	<p>BALLONA WETLANDS AS PART OF THE WORK PLAN OF THE NEP (National Estuary Program)</p> <p>Grassroots Coalition was in attendance at the WorkPlan meeting and provided numerous comments of need of review inclusions.</p> <p>Issues that continue to need address that pertain to the Ballona Wetlands include but are not limited to:</p> <ul style="list-style-type: none"> a. Sea level rise negative impacts upon the freshwater aquifers underlying Ballona Wetlands. b. Subsidence potential damage to the coast from SoCalGas/ Playa del Rey operations inclusive of saltwater intrusion. c. Corrosion aspects of sea level rise including the effects of the certified CDFW Ballona restoration plan upon SoCalGas/ PDR Underground Gas Storage Operations infrastructure. d. Assess the benefit of addition of and inclusion of a least damaging alternative to Ballona Wetlands that includes protection of Ballona as a freshwater dependent wetland/grassland/ salt panne/ upland complex ecosystem. And, address the ongoing diversion of groundwater and surface water away from Ballona Wetlands. Include assessment to assure freshwater protection and groundwater sustainability and biodiversity protection as included in Gov. Newsom's orders. 	Comment noted. These comments relate to CDFW's restoration plan for the Ballona Wetlands Ecological Reserve. See response to comment 6.01 and 6.13.
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				<p>e. Assess the damage to the current Ballona ecosystems from the CDFW Plan to convert Ballona into a saltwater bay and the plan to bury current wetland delineated habitat into FILL (ED) habitat, including burying of upland/grassland habitat into FILL(ed) habitat.</p> <p>f. Assess the amount of new levees per the CDFW Plan that will be Vector Controlled, mowed habitat per USACE REGULATIONS for new levees.</p>	
13	6.05	Written Comment	Randy Rodriguez (California Department of Fish & Wildlife)	<p>[Comment regarding Long-Term Environmental Result(s) / Outcome(s)] This statement on creating public access is assumed to be part of the overall restoration identified in the primary clause and is not separate from it.</p>	<p>Comment noted. The FY22 Work Plan is consistent with the Long-Term Environmental Results / Outcomes identified in the CCMP Action Plan adopted by the Governing Board in October 2018. The drafting of the CCMP Action Plan went through an iterative year-long public process that included numerous public stakeholder meetings and workshops. At this time, the SMBNEP is not further revising the CCMP Action Plan. In this instance, two outcomes were identified for Action #13; they are not necessarily independent from one another.</p>

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13	6.06	Written Comment	Randy Rodriguez (California Department of Fish & Wildlife)	[Comment regarding Next Step #1, Partners] Delete CDFW. Yes, CDFW identified as lead.	Comment incorporated into Action #13, Next Step #1: CDFW was removed from "Partner(s)" as CDFW is already referenced as the lead for this task.
13	6.07	Written Comment	Randy Rodriguez (California Department of Fish & Wildlife)	[Comment regarding Next Step #3, Partners] Add SCC. Delete CDFW. Yes, CDFW identified as lead.	Comment incorporated into Action #13, Next Step #3: Under "Partner(s)", CDFW was removed as CDFW is already referenced as the lead for this task and State Coastal Conservancy (SCC) was added.
13	6.08	Written Comment	Walter Lamb (Ballona Wetlands Land Trust)	<p>Ballona Wetlands</p> <p>While there is a task in the draft work plan for NEP staff to support the lead agencies to secure project funding and to help obtain permits for the Ballona Wetlands Restoration Project, the NEP's Policy, Management and Technical Committees have never made any effort to assess whether the recently certified project plans actually further the objectives of the Commission or the state. It is beyond absurd to suggest that the NEP can task itself with helping to secure funds and permits for a major restoration plan, but cannot assess the effectiveness of that plan to achieve the NEP's restoration objectives. A plain reading of the certified</p>	Comment noted. It is consistent with the mission, objectives and function of the Commission and the Santa Monica Bay NEP to support lead agencies' habitat restoration planning including planning for the Ballona Wetlands Ecological Reserve through the public EIR process, and support lead agencies to identify and obtain restoration funding once the EIR is certified. For comment regarding the "requested work plan action", the FY22 Work Plan is consistent with the Actions identified in the CCMP Action Plan adopted by the Governing Board in October 2018. The drafting of the CCMP Action Plan went through an iterative year-long public process that

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				<p>project plan shows that implementation of the project would work against the NEP's and state's environmental sustainability objectives with regard to resiliency against sea level rise, reducing greenhouse gas emissions, protecting biodiversity, and ensuring equitable access to natural resources.</p> <p>Requested work plan action: Assess the extent to which the certified Ballona Wetlands Restoration Project plans further the objectives of Bay restoration, to include the extent to which the plans provide sustainable protection for critical wetland habitats and dependent wildlife species against the impacts of sea level rise, the extent to which the plans would affect the amount of greenhouse gases in the atmosphere, the impact of the plans on near and long term public access to the ecological reserve, and other potentially relevant issues.</p>	<p>included numerous public stakeholder meetings and workshops. At this time, the SMBNEP is not further revising the CCMP Action Plan. We will retain your suggestion for consideration in the next update of the CCMP.</p>

13	6.09	Written Comment	Walter Lamb (Ballona Wetlands Land Trust)	<p>Specifically with regard to public access, it is clear that groups with an interest in restricting interim access have successfully put off any opportunity consensus building on this issue. It is frankly obscene that groups touting the environmental justice aspects of a future project are simultaneously fabricating reasons to deny access now and in the near future, while far less compatible land uses continue unabated. In addition to the requested work plan action item below, the Executive Committee, at its March meeting, should direct staff to prepare a resolution for consideration and potential adoption by the Governing Board at its April meeting that reaffirms the NEP's support for ecologically sensitive public access to areas (most notably Area A) of the ecological reserve.</p> <p>Requested work plan action: Assess the benefit of enhancing the level of existing public access to currently neglected and unused areas of the ecological reserve (such as Areas A and C of the reserve) in a manner that protects wildlife and their habitats, that respects cultural resources, and that allows outdoor nature education and stewardship activities, and adopt an appropriate, non-regulatory NEP policy in accordance with that assessment.</p>	Comment noted. See response to comment 6.03.
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13	6.10	Workshop (Breakout Summary)	Group 1	Cross-cutting Projects • Ballona wetlands have several existing / proposed projects that address all four of these key areas	Comment noted. See response to comment 6.01.
13	6.11	Workshop (Breakout Summary)	Group 2	Marine litter reduction • Concern that a large amount of water from the Ballona wetland project could turn into a sewage bathtub	Comment noted. See response to comment 6.01.
13	6.12	Workshop (Breakout Summary)	Group 3	SUGGESTIONS FOR FY22 WORK PLAN TO MITIGATE IMPACTS AND INCREASE RESILIENCY TO CLIMATE CHANGE Concerns: • Sea level rise will bring saline water into freshwater environments • Bulldozing activities related to berm construction will negatively impact air quality Strategies: • Slow, careful restoration for Ballona because wetlands absorb storm impacts • Protect wildlife (while allowing public access in appropriate conditions)	Comment noted. See response to comment 6.01.

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13	6.13	Workshop (Breakout Summary)	Group 3	OTHER IDEAS OR SUGGESTIONS FOR THE FY22 WORK PLAN Information and Data: <ul style="list-style-type: none"> • Need to conduct a Ballona wetlands hydrology study 	Comment noted. Several hydrology studies have been conducted specifically for Ballona Wetlands, including Chapter 3.9 of the Ballona EIR, information contained in the baseline reports and existing condition report, EIR Appendix F6: Water Quality Technical Report, and EIR Appendix F7: Hydraulics and Hydrology Report. Many additional studies provide more information and are referenced in the EIR.
13	6.14	Workshop (Breakout Summary)	Group 4	Ballona Wetlands <ul style="list-style-type: none"> • Taking into account trail-building and access related goals, there are concerns about the White-tailed Kite and other species. • There was a question about how the long-term access goals of the Ballona Restoration project aligns with the current situation with some areas blocked off (e.g., Area A) • Other organizations should be considered for partnering on project implementation in Ballona (e.g., Ballona Wetlands Trust, Grass Roots Neighbors, Ballona Institute) 	Comment noted. See response to comment 6.01 and 6.03.

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13	6.15	Workshop (Breakout Summary)	Group 5	Nutrient pollution reduction • Consider the impacts of removal of earth that could cause seawater intrusion from Ballona restoration	Comment noted. See response to comments 6.01 and 6.13.

CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
13	6.16	Workshop (Breakout Summary)	Group 5	<p>Green infrastructure and resilience Considerations Related to Ballona Wetlands</p> <ul style="list-style-type: none"> • Include an action item in the work plan to assess how / if the proposed restoration plan strengthens resiliency • Organize a policy committee discussion about impacts of project on greenhouse gas emissions • The NEP Action Plan should reference other sites in CA or nationwide that would allow for removal of earth with associated impacts (saltwater intrusion, implications on freshwater aquifers and groundwater protections.) • Conduct a hydrology study regarding the potential implications of diverting fresh water from the wetlands and impacts on aquifers and the surface • Address historical studies done on Ballona Wetlands with bond monies • Equitable access to coastal resources is an important topic to consider • It is important to consider tsunami effects outside the Ballona area caused by the creation of berms/levees from Ballona Restoration project 	Comment noted. See response to comments 6.01, 6.03, and 6.13.

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14	7.01	Written Comment	Randy Rodriguez (California Department of Fish & Wildlife)	[Comment regarding Next Step 3] Is this for identifying crossings within the NEP plan area?	Comment noted. Yes, Action #14 is in reference to wildlife crossings within the NEP Study Area (see the CCMP Introduction Chapter for the NEP study area, including maps (pages 4-6)).
15	8.01	Written Comment	Randy Rodriguez (California Department of Fish & Wildlife)	[Comment regarding Next Step 2] USFWS should also be identified for CRLF.	Comment incorporated into Action #15, Next Step #2: US Fish and Wildlife Service (USFWS) was added under "Partner(s)".
16	9.01	Written Comment	Martha Tremblay (Los Angeles County Sanitation Districts)	For Action 16 on page 25 of the draft FY 22 Workplan there is mention of State Bond funding but also Safe Clean Water funding. Under the Milestone/Description summary "continue to oversee implementation" is listed. Is that the correct wording for the SMBRC role or should it be "continue to support implementation"? I wasn't sure if the State Bond money mentioned is Prop funding that is being managed partly by SMBRC? If so the wording would be correct but if you are referring to Safe Clean Water funds, for that SMBRC should continue to support.	Comment noted. The State Bond funding mentioned to be overseen by the Commission refers to the remaining Propositions 12 and 84 funding partially managed by Commission staff.

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16	9.02	Written Comment	Megan Cooper (State Coastal Conservancy)	I do not think SCC is a lead agency on this action. Please remove us.	Comment noted. SCC is identified as one of the leads for "facilitating bond funding" for the Action #16, Next Step #3. This is still considered appropriate given that the SCC is responsible for allocated funding under Propositions 1 and 68. Also, the FY22 Work Plan is consistent with the leads identified in the CCMP Action Plan adopted by the Governing Board in October 2018. The drafting of the CCMP Action Plan went through an iterative year-long public process that included numerous public stakeholder meetings and workshops. At this time, the SMBNEP is not further revising the CCMP Action Plan.
16	9.03	Workshop (Breakout Summary)	Group 2	Marine litter reduction • Find ways to enhance TDML implementation so compliance is achieved more quickly	Comment noted. Staff will continue supporting acceleration of TMDL compliance by facilitating projects relevant to Actions #16 and #17. Additionally, the SMBNEP will retain your suggestion for consideration in the next update of the CCMP.
19	10.01	Workshop (Breakout Summary)	Group 5	Water reuse and conservation • Consider whether a desalination plan would be good or bad for the bay, and assess whether consistent with the objectives of the NEP	Comment noted. No specific activities are planned for this fiscal year due to the lack of resources and projects of interest. Staff will continue to keep contact with the SWRCB and update the Commission as needed.

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21	11.01	Workshop (Breakout Summary)	Group 2	Water reuse and conservation <ul style="list-style-type: none"> • Integrate efforts related to preventing saltwater intrusion (e.g. South Bay and Dominguez Gap technologies) • Increase water capture onsite, including via property owners 	Comment noted. The current water recycling program by Hyperion and West Basin does inject recycled water for the prevention of saltwater intrusion. Also, the FY22 Work Plan includes Action #30, which involves community engagement, education, and informing policies related to water conservation and reuse.

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22	12.01	Workshop (Breakout Summary)	Group 1	Marine litter reduction • Certification program to help businesses that are conserving water	Comment noted. The FY22 Work Plan includes actions to engage the community in water conservation and engage businesses in water quality improvements. Action #30 involves community engagement, education, and informing policies related to water conservation and reuse. Action #31 aims to achieve water quality benefits by businesses through community engagement and implementation of best management practices. Also, the FY22 Work Plan is consistent with the Actions identified in the CCMP Action Plan adopted by the Governing Board in October 2018. The drafting of the CCMP Action Plan went through an iterative year-long public process that included numerous public stakeholder meetings and workshops. At this time, SMBNEP is not further revising the CCMP Action Plan. SMBNEP will retain your suggestion for consideration in the next update of the CCMP.

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24	13.01	Written Comment	Randy Rodriguez (California Department of Fish & Wildlife)	[Comment regarding Next Step #1, Partners] Seems like the RWQCB and ACOE would be potential partners here as well.	Comment incorporated into Action #24, Next Step #1: Los Angeles Regional Water Quality Control Board (LARQWCB) and Army Corps of Engineers (Army Corps) were added under "Partner(s)".
25	14.01	Written Comment	Erica Yelensky (US Environmental Protection Agency)	[Next step #1] Is there a specific project you can identify for FY 22?	Comment noted. At this time, TBF is partnering directly with LACDBH on implementation of three dune restoration coastal resiliency projects, including protecting key infrastructure identified in the LACDBH Vulnerability Assessment. TBF and LACDBH are continuing to work together to seek locations and funding for additional projects. None are currently funded for FY22.
25	14.02	Written Comment	Randy Rodriguez (California Department of Fish & Wildlife)	[Next Step #2, Partners] It seems like some of the other cities and transit agencies would be identified here as well.	Comment noted. Action #25, Next Step #2 of the FY22 Work Plan includes municipalities and "others", which includes transit agencies such as CalTrans and Metro, consistent with those identified in the CCMP Action Plan adopted by the Governing Board in October 2018. However, at this time, this Next Step is not part of the FY22 Work Plan. SMBNEP will retain your suggestion for consideration in the next fiscal year Work Plan.

CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
29	15.01	Written Comment	Thomas Parker (Los Angeles County Sanitation Districts)	Action 29 – Clarify SMBRC's role in Safe to Swim and Safe to Eat workgroups. The Safe to Swim interactive maps mentioned have not been updated from Port Hueneme to Seal Beach in a few years, so clarity into SMBRC's role in "assistance in maintaining and updating" those maps would be useful.	Comment noted. The State Water Resources Control Board (State Board) is the lead for participating in the California Water Quality Monitoring Council (CWQMC) and assisting in updating and maintaining the CWQMC's Safe to Swim map. While Commission staff support many activities in the Work Plan by updating the Commission on progress and summarizing accomplishments in semi-annual reports, as needed, the Commission is not identified as a lead or partner for Next Step #1.
29	15.02	Workshop (Breakout Summary)	Group 2	CLARIFICATION QUESTIONS Q: Item #29 [Reduce health risks of swimming in contaminated water and consuming contaminated seafood]– What is participation now? Is it just with the Safe to Swim workgroup? What is CMMP's focus/ role?	Comment noted. It seems that "CMMP" mentioned in the comment refers to "CWQMC" mentioned in the draft work plan. The role of the CWQMC is to coordinate and standardize monitoring programs and facilitate dissemination of monitoring data throughout the State, including development, maintenance, and update of the Safe to Swim interactive maps. Also, see response to comment 15.01.

CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
29	15.03	Workshop (Breakout Summary)	Group 4	Partnership Clarification Needs • Item 29: [Reduce health risks of swimming in contaminated water and consuming contaminated seafood]– clarify maintenance of maps; make clear that this project will be advanced in collaboration with the relevant work groups (e.g., Safe to Eat, Safe to Swim)	See response to comment 15.02.
30	16.01	Workshop (Breakout Summary)	Group 3	Water reuse and conservation • Promote Ocean Friendly Gardens to collect water, reuse, and percolate rather than divert runoff to storm drains; Playa Vista's water output should be cleaned and restored to wetland, rather than its current output pumping both polluted and possibly reusable water	Comment noted. For comment regarding rain gardens and other best management practices (BMP) stormwater projects, the FY22 Work Plan includes many actions to improve water quality through reduction or elimination of pollution from stormwater and point and nonpoint sources. Action #16 involves supporting activities to achieve Total Maximum Daily Loads (TMDLs) and Action #17 aims to infiltrate, capture, and reuse stormwater and dry-weather runoff through green infrastructure, LID, and other multi-benefit project. For comment regarding Playa Vista's water output, Playa Vista runoff is directed to the Freshwater Marsh as a BMP to improve water quality.

CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
31	17.01	Written Comment	Erica Yelensky (US Environmental Protection Agency)	[Next step #1] Is the goal of this activity to reach a new sector of businesses for the Clean Bay Certified program? What does the*signify?	Comment noted. The objective for this Next Step is oriented at using research to inform other opportunities for BMP implementation for water quality improvements, including new sectors and potential partners. Asterisk indicates a new Next Step for FY22 as compared to the FY21 Work Plan. This clarification is included in Section III of the Work Plan (SMBNEP Planned Activities, page 15).
31	17.02	Workshop (Breakout Summary)	Group 1	Marine litter reduction • “Rethink disposable”— #31 [Achieve water quality benefits by businesses through community engagement and implementation of best management practices] and Actions #32 [Reduce marine debris by supporting bans on single- use items, conducting outreach, and participating in trash reduction programs]	Comment noted. The FY22 Work Plan includes actions to reduce polluted stormwater runoff generated by businesses and marine debris. Action #31 aims to achieve water quality benefits by businesses through community engagement and implementation of best management practices. Action #32 aims to reduce marine debris by supporting bans on single-use items, conducting outreach, and participating in trash reduction programs. Also, see response to comment 18.02.

CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
32	18.01	Workshop (Breakout Summary)	Group 1	Marine litter reduction • Reduction of metallic balloons	Comment noted. The FY22 Work Plan is consistent with the Next Steps identified in the CCMP Action Plan adopted by the Governing Board in October 2018. The drafting of the CCMP Action Plan went through an iterative year-long public process that included numerous public stakeholder meetings and workshops. At this time, SMBNEP is not further revising the CCMP Action Plan. SMBNEP will retain your suggestion for consideration in the next update of the CCMP.

CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
32	18.02	Workshop (Breakout Summary)	Group 5	Marine litter reduction • Regarding Action #32 [Reduce marine debris by supporting bans on single- use items, conducting outreach, and participating in trash reduction programs]: Has outreach to cities about source reduction projects occurred? There could be value in convening cities and restaurants on this topic. For example, there may be value in rethinking the Clean Bay Restaurant Certification Program.	Comment noted. TBF is a part of the Reusable LA coalition and through this has been actively mobilizing and supporting local (County of Los Angeles, City of Los Angeles, as well as other cities such as Pasadena), state, and federal source reduction legislation. Separate from policy, TBF has partnered with Clean Water Action to implement its ReThink Disposable (source reduction) program in Los Angeles. In FY22 TBF will be carrying out ReThink Disposable, resulting in a minimum of three local food service establishments reducing single-use disposable items onsite. Lastly, in 2017 the Clean Bay Certified restaurant inspection checklist was revised to incorporate several source reduction items.
33	19.01	Written Comment	Thomas Parker (Los Angeles County Sanitation Districts)	Action 33 – Will the Bay studies for microplastics methods be using standardized methods (e.g. ASTM)? Clarify The Bay Foundation's role in the SCCWRP microplastics fate and transport study. Is TBF collecting the data, or supporting the project in some other way?	Comment noted. TBF is supporting the CRI microplastics research led by Dr. James Landry's lab at LMU and his work on improving microplastics extraction methods for sediments (particularly sands) and invertebrates, including several research studies in Santa Monica Bay. The SCCWRP research is separate but related.

CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
33	19.02	Workshop (Breakout Summary)	Group 2	Marine litter reduction • Improve description of manuscript in item #33 [Monitor microplastics (including microfibers) and other marine debris in the Bay and coastal environments to inform management actions]	Comment noted. Dr. James Landry / CRI are currently drafting a manuscript based on the CRI microplastics research. Also, see response to comment 19.01.
33	19.03	Workshop (Breakout Summary)	Group 2	CLARIFICATION QUESTIONS Q: Item #33 [Microplastics] – Description is confusing. What are next steps? Where are you at in the process?	Comment noted. See Action #33, Next Steps #1-3 and responses to comments 19.01 and 19.02.
34	20.01	Written Comment	Thomas Parker (Los Angeles County Sanitation Districts)	Action 34 – Clarify SMBRC's / TBF's supportive role in CEC monitoring and methodology project.	Comment noted. TBF is only identified in Next Step #1 for this Action as one of the many partners listed with the potential to collect or inform opportunistic data collection or research studies. While Commission staff support many activities in the Work Plan by updating the Commission on progress and summarizing accomplishments in semi-annual reports, as needed, the Commission is not identified as a lead or partner for any of the Next Steps for #34.
36	21.01	Written Comment	Erica Yelensky (US Environmental Protection Agency)	[Next step 4] Should TBF be listed as a partner here?	Comment incorporated into Action #36, Next Step #4: TBF was added under "Partner(s)".

CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
36	21.02	Written Comment	Thomas Parker (Los Angeles County Sanitation Districts)	Action 36 – Consider including Del Mar Oceanographic (DMO) as a partner for the Wirewalker project stated in the action.	Comment incorporated into Action #36, Next Step #2: Del Mar Oceanographic (DMO) was added under "Partner(s)".
37	22.01	Written Comment	Thomas Parker (Los Angeles County Sanitation Districts)	Action 37 – The Wirewalker project is listed under Action 36; how is the project stated with LACSD as a partner different in this action?	Comment noted. The objective of Action #37 is to collect information on physical and biological characteristics of deep water habitat through surveys using ROV or other innovative or technological devices. LA County Sanitation Districts has expressed willingness to provide an ROV and participate in some such surveys, if feasible. Many partners are listed for Next Step #2 to be more inclusive of opportunistic emerging technologies.
37	22.02	Workshop (Breakout Summary)	Group 2	Los Angeles County Sanitation District is listed as partner, but their specific role needs to be clarified. Also, make sure that the organization name is accurate throughout.	For comment regarding clarification of LA County Sanitation Districts' (LACSD) role, see response for comment 22.01. Comment regarding correcting LACSD's name was incorporated: LACSD's name was corrected to "Los Angeles County Sanitation Districts" in the "Common Work Plan Acronyms" section.

CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
39	23.01	Written Comment	Bob Godfrey (Marina Del Rey Anglers)	CCMP Action: Monitor and inform effective management of Marine Protected Areas, Fishery Management Plans, and local fisheries for recreational uses Long-term Outcomes: Healthy sustainable fishery	Comment noted. The FY22 Work Plan is consistent with the Long-Term Environmental Results / Outcomes identified in the CCMP Action Plan adopted by the Governing Board in October 2018. The drafting of the CCMP Action Plan went through an iterative year-long public process that included numerous public stakeholder meetings and workshops. At this time, SMBNEP is not further revising the CCMP Action Plan. SMBNEP will retain your suggestion for consideration in the next update of the CCMP.

CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
39	23.02	Written Comment	Bob Godfrey (Marina Del Rey Anglers)	CCMP Next Step 1: Support MDRA in their operation of the Youth and Veteran Fishing Program Lead: MDRA Partners: LACDBH Objectives: Provide disadvantaged youth and veterans the opportunity to experience nature, boating, and fishing and healthy lifestyles Description: Support MDRA plan for 25 fishing trips Outputs: Update in annual report Long-term Outcomes: Healthy sustainable fishery	Comment incorporated into Action #39, Next Step #1: the suggested language was added under "Partner(s)", "Objectives", and "Description". SMBNEP tracks progress in meeting these Next Steps through updates in a semi-annual report and annual report. However, the FY22 Work Plan is consistent with the Long-term Environmental Results identified in the CCMP Action Plan adopted by the Governing Board in October 2018. The drafting of the CCMP Action Plan went through an iterative year-long public process that included numerous public stakeholder meetings and workshops. At this time, the SMBNEP is not further revising the CCMP Action Plan. SMBNEP will retain your suggestion for consideration in the next update of the CCMP.

CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
39	23.03	Written Comment	Bob Godfrey (Marina Del Rey Anglers)	CCMP Next Step 2: Support CDFW in the completion of a halibut Stock Assessment FMP Lead: CDFW Partners: OREHP, HSWRI, MDRA, CCA Objectives: Restore a healthy sustainable halibut fishery Description: Release HSWRI reared halibut into Santa Monica Bay	Comment incorporated into Action #39, Next Step #2: "CCA" was added under "Partner(s)", and "MDRA to release halibut into [Santa Monica] Bay" was added under "Description / Milestone Summary". Objectives of this Next Step are specific to SMBNEP's involvement in the program and includes "promotion of sustainable fisheries".
39	23.04	Written Comment	Bob Godfrey (Marina Del Rey Anglers)	New CCMP Next Step: Support white seabass Restocking Program (OREHP) Lead: MDRA, KHOEP Partners: LACDBH, OREHP, HSWRI, CCA Objectives: Restore the white seabass population Description: Release HSWRI reared white seabass into Santa Monica Bay Outputs: Update in annual report	See response to comment 1.01.

39	23.05	Written Comment	Steve Santen (Marina Del Rey Anglers)	<p>CA Halibut. HSWRI and DFW are spawning, rearing, and releasing halibut in Mission Bay. Some in the DFW still suspect a genetic anomaly in the Ca. Halibut stocks of SM Bay. Little scientific research has been done. Little data from SM Bay was used in the generation of the multiple Halibut stock Assessments produced by the DFW. We need to know if our Bay is unique in its Halibut population. Support of this fishery is both Commercially and Recreationally important. The Stock assessment first done in 2011 was restarted peer review resulted in mixed results. "Facilitated by Ocean Science Trust (OST), an independent scientific peer review of the updated halibut stock assessment was completed by a panel of experts. The Panel does not consider the northern area model base model for halibut to be adequate for use in management based primarily on four issues with the northern base model. Additionally, the Panel identified some technical issues in the southern area base model and recommends the Department further investigate these issues prior to using the model to inform management". Please See https://marinespecies.wildlife.ca.gov/california-halibut/false/. Although it has been Ten years in the making we still do not have a CA Halibut Stock Assessment, nor</p>	See response to comment 23.03.
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CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
				a FMP Fisheries Management Plan. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=185061&inline . I believe that the issues require the SANTA MONICA BAY RESTORATION COMMISSION play a more active role in this valuable fishery.	
39	23.06	Written Comment	Steve Santen (Marina Del Rey Anglers)	The Halibut stock assessment Peer review was chaired by the Ocean Science Trust. In its summary it states, "Results were shared for the southern stock assessment model and indicated that the resource was relatively depleted throughout the modeling timeframe" Ocean Science Trust-Halibut-Stock-Assessment-Peer-Review (https://www.oceansciencetrust.org/wp-content/uploads/2020/12/California-Halibut-Stock-Assessment-Peer-Review-Public-Webinar-Key-Themes-Summary.pdf)	See response to comment 23.03.

CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
39	23.07	Written Comment	Steve Santen (Marina Del Rey Anglers)	<p>CCMP Next Step 2: Support CDFW in Peer review of the Stock assessment and the completion of a Halibut FMP</p> <p>Lead: CDFW</p> <p>Partners: OREHP , HSWRI, MDRA, CCA</p> <p>Objectives: To provide technical and outreach support to CDFW in participating and tracking the development of a Halibut FMP by CDFW and promotion of a healthy Fishery</p> <p>Description: 1. Resolve the suspicion that a Genetically isolated Halibut Population exists in SM Bay. 2. Produce a Halibut FMP 3. Develop an Enhancement Plan that yields HSWRI Halibut fry into SM Bay.</p> <p>Long-term Outcomes: Healthy & Sustainable Halibut fishery that supports both the Commercial and Recreational Industries.</p>	See response to comment 23.03.

39	23.08	Written Comment	Steve Santen (Marina Del Rey Anglers)	<p>HSWRI and DFW are spawning, rearing, and releasing halibut in Mission Bay. Some in the DFW still suspect a genetic anomaly in the Ca. Halibut stocks of SM Bay. Little scientific research has been done. Little data from SM Bay was used in the generation of the multiple Halibut stock Assessments produced by the DFW. We need to know if our Bay is unique in its Halibut population. Support of this fishery is both Commercially and Recreationally important. The Stock assessment first done in 2011 was restarted peer review resulted in mixed results. "Facilitated by Ocean Science Trust (OST), an independent scientific peer review of the updated halibut stock assessment was completed by a panel of experts. The Panel does not consider the northern area model base model for halibut to be adequate for use in management based primarily on four issues with the northern base model. Additionally, the Panel identified some technical issues in the southern area base model and recommends the Department further investigate these issues prior to using the model to inform management".</p> <p>Please See https://marinespecies.wildlife.ca.gov/california-halibut/false/</p>	See response to comment 23.03.
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CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
39	23.09	Workshop (Breakout Summary)	Group 2	OTHER IDEAS OR SUGGESTIONS FOR THE FY22 WORK PLAN • Interest in increasing angling and hatcheries, especially halibut and white seabass	See response to comment 1.01.
39	23.10	Workshop (Breakout Summary)	Group 4	Partnership Clarification Needs Item 39: [Monitor and inform effective management of Marine Protected Areas, Fishery Management Plans, and local fisheries for recreational and commercially important species] – work plan language should make clear that Marina del Rey Anglers are supporting CDFW in completing the halibut stock assessment; review comments from Marina del Rey Anglers representative related to updates to the White Seabass project	Comment noted. CDFW is identified as the lead agency for Action #39, Next Step #2, and MDRA is identified as a partner. Also, see response to comments 23.05-23.07.
40	24.01	Workshop (Breakout Summary)	Group 5	Nutrient pollution reduction • Regarding Action #40 [Research and inform best management and pollution reduction practices to address non- point source pollution and facilitate reduction]: Consider including a policy transition from lawns and use of chemical fertilizers towards native, drought-tolerant, and water capture	Comment noted. The FY22 Work Plan includes Action #30, Next Step #2, which involves promoting the use of drought-tolerant native plants. SMBNEP will also retain your suggestion for consideration in the next update of the CCMP.

CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
42	25.01	Written Comment	Cung Nguyen (Los Angeles County Department of Public Works)	Page 64 of the plan (page 68 of the PDF document), Action Item No. 42: for the Partner(s) column, change the font size accordingly to keep "Municipalities" on the same line	Comment noted. The font size of the FY22 Work Plan (12 point) document is consistent with accessibility standards and cannot be reduced.
43	26.01	Written Comment	Cung Nguyen (Los Angeles County Department of Public Works)	<p>Page 64 of the plan (page 68 of the PDF document), Action Item No. 43:</p> <p>For CCMP Action column: Revise the action From: "Implement the County-wide Safe Clean Water Program to support stormwater pollution control projects (if approved by voters in 2018)"</p> <p>To: Implement the County-wide Safe Clean Water Program to protect water quality within our communities and provide new sources of water for current and future generations (approved by voters in 2018)</p> <p>For the Partner(s) column: Change the font size accordingly to keep "municipalities" on the same line</p>	For comment regarding changes to the description of Action #43, the suggestion was incorporated in Next Step #1: "protect water quality within our communities" and "provide new sources of water for current and future generations" was added under "Objectives". However, the FY22 Work Plan is consistent with the Actions identified in the CCMP Action Plan adopted by the Governing Board in October 2018. The drafting of the CCMP Action Plan went through an iterative year-long public process that included numerous public stakeholder meetings and workshops. At this time, SMBNEP is not further revising the CCMP Action Plan. For comment regarding font size, see response to comment 25.01.

CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
General Comment	27.01	Written Comment	Erica Yelensky (US Environmental Protection Agency)	Please include revising the Quality Assurance Program Plan in your workplan. At a minimum, can we plan to have the milestone be an updated draft in FY 22? Let's discuss.	Comment incorporated into Action #36, Next Step #3: the revised QAPP was added under "Description / Milestone Summary" and "Outputs / Deliverables".
General Comment	27.02	Written Comment	Erica Yelensky (US Environmental Protection Agency)	I saw staff support for the technical advisory committee, but not for the executive committee and governing board meetings in the work plan. Please consider adding this.	Comment noted. Supporting the Executive Committee, the Governing Board, as well as the Commission's TAC is the core function of Commission staff, which are related to all, but not tied to any specific actions. See Appendix B for roles of Commission staff and TBF staff. Also, the FY22 Work Plan references technical advisory committees convened by other agencies for special purposes or projects mentioned that Commission staff and TBF staff may participate in or support.
General Comment	27.03	Written Comment	Erica Yelensky (US Environmental Protection Agency)	Per the funding guidance, the work plan is due to EPA by June 1, not April 30.	Comment noted. The date will be corrected in the staff report associated with the Governing Board's consideration of approval of the draft FY22 Work Plan.
General Comment	27.04	Written Comment	Erica Yelensky (US Environmental Protection Agency)	Please consider including language addressing how some activities may be restricted or done differently due to COVID.	Comment incorporated in Section III (SMBNEP Planned Activities) of the FY22 Work Plan.

CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
General Comment	27.05	Written Comment	Erica Yelensky (US Environmental Protection Agency)	We recognize that you are working in a complex environment and partners may shift due to a variety of reasons. Please consider including language addressing this.	Commented incorporated in Section III (SMBNEP Planned Activities) of the FY22 Work Plan.
General Comment	27.06	Written Comment	Kathy Knight (Ballona Ecosystem Education Project)	1. We agree with the comments of the Ballona Wetlands Land Trust, and of Grassroots Coalition.	Comment noted.
General Comment	27.07	Written Comment	Kathy Knight (Ballona Ecosystem Education Project)	2. At the Stakeholder meeting there were about 6 people from the Bay Foundation. But the majority of participants were groups and citizens concerned about the proposed restoration of the Ballona Wetlands Ecological Reserve (BWER). However there was not much support from the Bay Foundation to follow up with plans to include working on the concerns raised. It seemed like it was just a required meeting that the Bay Foundation had to get done, but with no follow up. We are disappointed at that.	Comment noted. See response to comment 6.01. TBF and Commission staff both participated in the February 24, 2021 Santa Monica Bay Stakeholders Workshop, though it was led by the Commission's Governing Board Chair with professional facilitation services provided by CBI. This Response to Comments document and the updated draft FY22 Work Plan reflect input received during the Workshop and the written public comment period, as well as staff review.

CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
General Comment	27.08	Written Comment	Kathy Knight (Ballona Ecosystem Education Project)	There are many more important issues that were brought up at this once a year meeting. How can we view a recording of the meeting to document them, and can there be a transcript made to review?	Comment noted. In addition to comments in this Response to Comments document, the recording and breakout session summaries from the February 24, 2021 Santa Monica Bay Stakeholders Workshop are available from Commission staff upon request.
General Comment	27.09	Written Comment	Kathy Knight (Ballona Ecosystem Education Project)	<p>We have many other concerns, as do other participants. How can we get them resolved? Who do we talk to and how do we work with them to resolve these issues?</p> <p>We look forward to someone contacting us to answer our questions as soon as possible.</p>	Comment noted. For issues regarding particular projects, please contact the lead agency. In addition to participating in the annual workshop and making public comments during all Commission meetings, you can contact Commission staff to help identify the best agency and/or person for addressing your concerns.

General Comment	27.10	Written Comment	Patricia McPherson (Grassroots Coalition)	<p>Background</p> <p>Grassroots Coalition(GC) has been participating with the Santa Monica Bay Restoration Project, now known as the Santa Monica Bay Restoration Commission for the past 15 years. During this timeframe we have attempted to bring the Commission into alignment with its legislated mandates of operation as we focused upon the rare habitat and ecosystems of Ballona Wetlands within the Santa Monica watershed. While certain positive changes were made, that included the separation of the private business -The Bay Foundation's board members from having a controlling leadership of the Commission, it was short-lived. A lawsuit in which the Ballona Wetlands Landtrust prevailed, gave rise to a momentary pause in the private business's control over the Commission but this separation has been eaten away with the support of USEPA to the Bay Foundation. The Bay Foundation, was founded by highly conflicted consultants beholdng to developer and fossil fuel interests and remains a highly conflicted group that preys upon public bond funding.</p>	Comment noted. The Commission's roles and functions under the legislated mandate is laid out in the amended Memorandum of Understanding (MOU) approved in June 2020. Under the 2020 MOU, the Commission serves as the Management Conference, and The Bay Foundation serves as the Host Entity of the SMBNEP.
General Comment	27.11	Written Comment	Patricia McPherson	None of the early tenets of the SMBRProject have been allowed to occur and most have now been totally stripped	Comment noted. The 2020 MOU improved and enhanced mechanisms for broader and more effective

CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
			(Grassroots Coalition)	<p>away and the SMBRC Commission only provides lip service to so-called public & stakeholder participation.</p> <p>Most recently the SMBRP's tenet of providing for public/stakeholder participation in groups working throughout the year with SMBRC staff to discuss individual projects and provide for true transparency and accountability has been totally stripped away for good, after years of attempts by the public & stakeholders to have it enforced.</p>	<p>stakeholder participation by being open to all stakeholders, including members of the general public, increasing the number and diversity of engaged and active stakeholders in the Santa Monica Bay watershed, and encouraging ongoing participation in Commission's activities. All stakeholders are encouraged to stay informed and engaged with Commission activities, provide information and input to inform the Commission's decision-making processes, attend Commission meetings (e.g., Governing Board, Executive Committee, TAC, and annual stakeholder workshop(s)), and provide comments during public forum.</p>

CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
General Comment	27.12	Written Comment	Patricia McPherson (Grassroots Coalition)	<p>The bond funds spent on Ballona Wetlands that have been manipulated through the SMBRCommission and the SMBRFOUNDATION, aka The Bay Foundation and its leadership that also controlled the SMBR Authority bond funds, have been determined to have been abused and misappropriated by both the Dept. of Finance (2010 Audit) and by the Los Angeles County Board of Supervisors in an audit. There is no dispute that funds have been misappropriated and misspent with lack of approvals by both the County Board of Supervisors and the Commission itself. (Audits)</p> <p>While the Bay Foundation/SMBRC/SMBR AUTHORITY(Bay Foundation) were given a verbal cuff for the wrongdoing, it is apparent that 'verbal cuffs' provide only for a heightened green light for wrongdoing.</p>	Comment noted. All State bond awards and spending based on recommendation of the Commission were overseen by other state agencies mandated to administer the bond funding and subject to State audit. Commission staff are not aware of incidence or evidence of misappropriation, misspending, or wrongdoing.

CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
General Comment	27.13	Written Comment	Patricia McPherson (Grassroots Coalition)	<p>Lastly, Grassroots Coalition supports the written 3/5/21 comments made by the Ballona Wetlands Landtrust in full. And, requests viewing of the SMBRC Meeting attached as GC supports the comments made 10/22/20 and requests response to all.</p> <p>McPherson, Knight, Dr. Griswold, Harden, Lamb—YouTube</p> <p>https://www.youtube.com/watch?v=M9tB0YHzHy0</p>	Comment noted.
General Comment	27.14	Written Comment	Thomas Parker (Los Angeles County Sanitation Districts)	Update our agency name to Los Angeles County Sanitation Districts to reflect our current name	See response to comment 22.02.

General Comment	27.15	Written Comment	Walter Lamb (Ballona Wetlands Land Trust)	<p>General Comment</p> <p>For eight or so years I have been taking the time to research, document, and provide feedback on issues of importance to the Ballona Wetlands, a critical ecosystem in the Santa Monica Bay Watershed. It has not been time well spent because there is never any effort to gauge stakeholder consensus and the process for determining which suggestions are incorporated into the work plan and which are dismissed is beyond the public's view. The Commission has instead abdicated this governmental decision-making process over to The Bay Foundation, which routinely dismisses any suggestion for increased project accountability as being outside the scope of the work plan. Sadly, this National Estuary Program is not science-based or fact-based, but instead operates as a political networking club focused on the flow of bond funds. This NEP seems incapable of acknowledging its mistakes, whether related to work on special interest projects at Ballona, abdicating its public duties, pushing for poorly thought out legislation, or failing to disclose public records, and instead uses public resources to double down on those mistakes without any regard for the impact to the public interest. The resulting leadership vacuum is a direct cause of the</p>	<p>Comment noted. All Commission decision-making, including review and consideration of approval of the SMBNEP Annual Work Plan with stakeholder input, occurs during meetings open to the public and with opportunities for public comments.</p>
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CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
				<p>ongoing neglect, delays, and cost overruns at the Ballona Wetlands.</p> <p>I am submitting these comments to maintain a record of our repeated but unsuccessful attempts to work within the system.</p>	
General Comment	27.16	Written Comment	Walter Lamb (Ballona Wetlands Land Trust)	<p>Transparency</p> <p>There is no associated action item related to this issue, just a common sense observation that when a state agency hosts a series of public meetings and invites the public to participate in the development of a public work plan, the primary if not sole purpose of which is to be submitted as part of a broader application to US EPA for federal assistance, that application and the corresponding grant agreement should be (and is legally required to be) accessible to the state agency and to the public.</p>	<p>Comment noted. The Commission's Governing Board reviews and approves the SMBNEP Annual Work Plan, but the Commission is not the entity submitting the federal grant application. As a public entity, the Commission makes all Commission records available to the public as required by State law.</p>

CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
General Comment	27.17	Workshop (Breakout Summary)	Group 1	OTHER IDEAS OR SUGGESTIONS FOR THE FY22 WORK PLAN <ul style="list-style-type: none"> • Need to remember the importance of cross-boundary thinking and partnerships in any and all projects—this is important for coordination and effectiveness, and avoiding situations where folks are operating in silos • Multi-benefit / co-benefit projects are important 	Comment noted. Cross-boundary, collaborative, and multi-benefit projects are identified throughout the FY22 Work Plan.
General Comment	27.18	Workshop (Breakout Summary)	Group 2	OTHER IDEAS OR SUGGESTIONS FOR THE FY22 WORK PLAN <ul style="list-style-type: none"> • Identify multi-benefit projects (e.g. green spaces that serve infiltration and wastewater recycling, kelp restoration that provides habitat and supports coast resiliency, nutrient pollution reduction, etc.) 	See response to comment 27.17.
General Comment	27.19	Workshop (Breakout Summary)	Group 3	OTHER IDEAS OR SUGGESTIONS FOR THE FY22 WORK PLAN Information and Data: <ul style="list-style-type: none"> • Focus on data transparency, quality monitoring, and sharing 	See response to comment 27.01.
General Comment	27.2	Workshop (Breakout Summary)	Group 3	OTHER CONCERNS <ul style="list-style-type: none"> • Agencies' roles and actions seem to conflict with overarching goals 	Comment noted. Assuming the term "agency" refers to the Commission, the Commission's goals, and roles and functions are clearly stated in the 2020 MOU.

CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
General Comment	27.21	Workshop (Breakout Summary)	Group 3	<p>OTHER IDEAS OR SUGGESTIONS FOR THE FY22 WORK PLAN</p> <p>Outreach and Engagement:</p> <ul style="list-style-type: none"> • Create educators and trainers • Support public access (under appropriate conditions) • Rely on groups who have been long-term stewards (e.g., Audubon) • Focus on DEI and getting younger generations involved and leading (Ben Hamilton offered to guest present on kelp substrate) • Goals / desired outcomes should align with the NTRL system; Santa Monica is an exposed coast, rather than an estuary 	Comment noted. Community and stakeholder engagement projects are identified throughout the FY22 Work Plan. See also Actions #26-32, and partners identified throughout document.
General Comment	27.22	Workshop (Breakout Summary)	Group 3	<p>OTHER IDEAS OR SUGGESTIONS FOR THE FY22 WORK PLAN</p> <p>Information and Data:</p> <ul style="list-style-type: none"> • Gather information on marine benthic ecology (kelp forests) 	Comment noted. The FY22 Work Plan includes Action #2, which involves restoring kelp and gathering information on the kelp community following restoration efforts, including by monitoring biological responses (Next Step #2) and conducting carbon sequestration assessments (Next Step #4).

CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
General Comment	27.23	Workshop (Breakout Summary)	Group 3	OTHER CONCERNS • Plant trees and kelp—over 60% of oxygen comes from the sea and is produced by algae and marine plants. LA County is in the process of losing 6 million trees. Plant trees that resist the fungus carried by bark beetle.	Comment noted. See response to comment 1.07 and 24.01. The FY22 Work Plan also includes Action #4, which involves restoring seagrass habitat to mitigate impacts and increase resiliency to climate change. Also, tree planting could be integrated into many actions, depending on the projects being implemented (e.g., Actions #14-17).
General Comment	27.24	Workshop (Breakout Summary)	Group 4	Work Plan should reference the name change of LACSD – now: “Los Angeles County Sanitation Districts”	See response to comment 22.02.
General Comment	27.25	Workshop (Breakout Summary)	Group 4	Need to make clear what actions in the work plan are already complete, versus those that are in progress or planned	Comment incorporated: Appendix A (Table of Completed Projects in FY21) was added to the FY22 Work Plan.
General Comment	27.26	Workshop (Breakout Summary)	Group 5	OTHER SUGGESTIONS FOR FY22 WORK PLAN • Consider subsidence and potential uplift related to SoCal Gas activities	Comment noted. This suggestion is currently outside the scope of the existing CCMP.
General Comment (Green infrastructure and resiliency)	28.01	Workshop (Breakout Summary)	Group 1	• Cross-boundary thinking is key • Target having more resources for safe clean water	See response to comment 27.17.

CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
General Comment (Green infrastructure and resiliency)	28.02	Workshop (Breakout Summary)	Group 3	<ul style="list-style-type: none"> • Berms are a major concern • Alternative structures including wetlands • Reef structures • Plant trees and restore kelp forests 	Comment noted. The FY22 Work Plan includes several actions that improve coastal resilience, including by restoring habitat (Actions #2, #4-#9, #12, and #13) and enhancing ecosystem function (Actions #3, #10, #11, and #14). Also, for comment regarding planting trees, see response to comment 27.23.
General Comment (Marine litter reduction)	29.01	Workshop (Breakout Summary)	Group 3	<ul style="list-style-type: none"> • Keep in mind neighboring parks, rec areas, etc. near the watershed • Non-point source litter reduction in the watershed. 	Comment noted. The FY22 Work Plan includes several actions to reduce non-point source pollution in the watershed, including Action #20, which involves support of elimination of non-point pollution from onsite wastewater treatment systems. Also, see responses to comments 27.02 and 27.17.

CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
General Comment (Mitigate impacts and increase resiliency to climate change)	30.01	Workshop (Breakout Summary)	Group 1	<p>SUGGESTIONS FOR FY22 WORK PLAN TO MITIGATE IMPACTS AND INCREASE RESILIENCY TO CLIMATE CHANGE</p> <ul style="list-style-type: none"> • Think beyond engineering • Emphasis on reduction of CO2 and other greenhouse gases • Use all the resources in the basin, including other areas of public works, alternative fuels, and water reuse • Emphasize environmentally safe designs / approaches • Address climate change and resiliency in a holistic way • Potential to include handling of organic materials as another focus area to integrate across silos • When looking at watersheds, climate change is a bullet point coming forward for all projects 	See response to comment 27.17.
General Comment (Mitigate impacts and increase resiliency to climate change)	30.02	Workshop (Breakout Summary)	Group 2	<p>SUGGESTIONS FOR FY22 WORK PLAN TO MITIGATE IMPACTS AND INCREASE RESILIENCY TO CLIMATE CHANGE</p> <ul style="list-style-type: none"> • The included projects for climate change mitigation and resiliency are well-thought out 	Comment noted.

CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
General Comment (Mitigate impacts and increase resiliency to climate change)	30.03	Workshop (Breakout Summary)	Group 5	SUGGESTIONS FOR FY22 WORK PLAN TO MITIGATE IMPACTS AND INCREASE RESILIENCY TO CLIMATE CHANGE <ul style="list-style-type: none"> • Consider the Playa del Rey gas facility implications for climate change • Consider SoCal Gas saltwater corrosion from infrastructure 	Comment noted. This suggestion is currently outside the scope of the existing CCMP.
General Comment (Nutrient pollution reduction)	31.01	Workshop (Breakout Summary)	Group 1	Nutrient pollution reduction <ul style="list-style-type: none"> • Ballona creek TMDL restoration project example 	Comment noted. See response to comment 9.03.
General Comment (Nutrient pollution reduction)	31.02	Workshop (Breakout Summary)	Group 3	<ul style="list-style-type: none"> • Protect aquifers from saltwater intrusion and study risk potential 	Comment noted. The FY22 Work Plan is consistent with the Actions identified in the CCMP Action Plan adopted by the Governing Board in October 2018. The drafting of the CCMP Action Plan went through an iterative year-long public process that included numerous public stakeholder meetings and workshops. At this time, SMBNEP is not further revising the CCMP Action Plan. SMBNEP will retain your suggestion for consideration in the next update of the CCMP.

CCMP Action No. (if applicable)	Comment No.	Comment Submission	Commenter	Comment	Response
General Comment (Water reuse and conservation)	32.01	Workshop (Breakout Summary)	Group 1	<ul style="list-style-type: none"> • Rain barrels (usually for private citizens, but potential usage for municipalities) • More permeable parking lots • Dry weather diversions • Prioritize water quality in every project • Review Culver City rain gardens project, LAX related initiatives, and Hermosa Beach project as examples of diverting stormwater 	Comment noted. See response to comment 16.01.

**California Department of Fish & Wildlife (CDFW) October 7, 2020 Memo to the
Santa Monica Bay Restoration Commission
Governing Board Chair**

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Memorandum

Date: October 07, 2020

To: Mr. Guangyu Wang, Chief Administrative Director
Santa Monica Bay Restoration Commission
320 West 4th Street, Suite 200
Los Angeles, CA 90013

From: Richard G. Burg
Environmental Program Manager
California Department of Fish and Wildlife
3883 Ruffin Rd
San Diego, CA 92123

Subject: Ballona Wetlands Access

Dear Director Wang:

The California Department of Fish and Wildlife (Department) sincerely appreciates the SMBRC's interest in Department lands, and particularly access at the Ballona Wetlands Ecological Reserve (BWER). This letter is intended as a follow-up to, and to reiterate, what was presented to the Santa Monica Bay Restoration Commission (SMBRC) on August 20, 2020.

The BWER is an Ecological Reserve with the primary purpose of protection and enhancement of native rare species and habitats. It is not uncommon for our Ecological Reserves to be closed to the public and/or with limited access so the Department can concentrate efforts on wildlife stewardship and operational needs; there are many examples of this throughout California and here in our own south coast region.

The Department acknowledges concerns that an approximate 4-acre portion of Area A has not been opened to the public for managed access as proposed in the 2007 Early Action Plan. Although the plan is still marked as draft, much of it has been implemented (e.g., Area B signage, trails, and fencing, site security, litter and trash removal, Reserve-wide signage). With public access and educational opportunities currently being provided at BWER (albeit current stoppage due to the COVID 19 pandemic) and after careful consideration, the Department has decided against opening additional access at this time due to operational and maintenance constraints including planning, staffing, funding, control, and safety concerns.

On the topic of funding and safety concerns, the last time a portion of Area A was opened a Mountains Recreation and Conservation Authority ranger was present. That presence helped ensure that any visitor or vehicle would not be stuck in BWER after hours when the gate was closed, ensure visitors remained on the trail instead of wandering out into other portions of Area A, and that any interaction with the homeless was benign. Although Department wardens conduct routine patrols and coordinate with local homeless and law enforcement agencies to post and remove homeless encampments from BWER, the openness and large amount of space make maintaining the area free of homeless encampments near impossible. In fact, an

unauthorized site visit to BWER by a politician occurred on the same day and time and in near proximity to a Department enforcement action at a homeless encampment. Modifications to the channel, levees, and topography via the proposed restoration project would prevent reestablishment of these encampments. Until then, enforcement actions, including encampment removals, will continue in Area A. Ultimately, without funding and/or proper staffing to ensure visitor safety and appropriate use, additional access to BWER at this time is infeasible.

Below are illustrations of numerous current public use opportunities at BWER in Areas B and C (see also Attachment A):

- Ballfields (a non-wildlife-dependent use), where 100's of children (many underserved), are able to enjoy the outdoors for much of the year,
- Two education programs: In 2019 the reserve hosted approximately 9,500 K-12 children (approximately half of them from Title 1 schools), over 9,000 volunteer hours from 3,000 volunteers, and nearly 200 field trips and events. These education programs serve dozens of zip codes from the West Valley to East Los Angeles to Long Beach (many underserved communities). The Friends of Ballona have informed CDFW that they do not turn anyone away,
- 2019 Bay Foundation Ballona restoration activities included 41 events with over 100 volunteers,
- A bike path that runs the entire length of the Reserve allowing viewing of Areas A and South Area C.,
- A visitor viewing platform used by the two educational programs,
- Two active community engaged restoration events,
- A replica Native American village which is open to the general public once a month, and
- Boating and fishing in the Ballona Creek main channel (barbless hooks only).

The Department is fully aware of the need for access to open space in one of the largest urban areas in the world, and have been, are, and will continue to accommodate and expand where it's feasible and makes sense. If we were in the position to expand access at BWER it would likely come in the form of expanded opportunities in West Area B where we have existing partners, program infrastructure, somewhat functional tidal wetlands, a secure site, and ongoing dune habitat restoration.

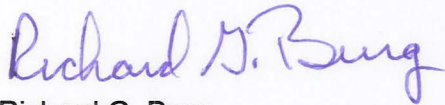
The Department recommends other areas that would provide similar and/or higher quality recreational opportunities the public may be seeking. There are several State Parks, State Historic Parks, and/or State Recreational Areas within approx. 20 miles of BWER. These parks have far superior facilities than found at BWER. Baldwin Hills Scenic Overlook (BHSE) is 7.5 miles east of BWER situated on a bluff overlooking the Ballona Creek. This park has numerous amenities including parking, restrooms, hiking trails, and a Visitor Center. Kenneth Hahn State Recreational Area is located just 8 miles away near BHSE. This recreational area is run by the County of LA and has amenities such as parking and restrooms. It also has a fishing lake. Will Rogers State Historic Park is located 10 miles away and has parking, restrooms, hiking trails, and a Visitor Center. Trippet Ranch is a wonderful location and situated in Topanga State Park approx. 17 miles northeast of BWER. Trippet Ranch has plenty of parking, restrooms, and numerous well signed hiking trails. The four parks I mention above have a wide range of habitat types including but not limited to

wetlands, coastal sage scrub, riparian, chaparral, oak woodlands, and lacustrine that would allow the public recreational opportunities. Information to these and additional nearby State Parks can be found at: <https://www.parks.ca.gov/ParkIndex>.

Upon completion of the proposed restoration at BWER, potential public access improvements and visitor amenities may include up to 29,000 additional linear feet (approximately 5.5 miles) of pedestrian-only trails, approximately 2,000 linear feet of elevated, gateway entrances, educational features, viewing platforms with overlooks, and new and improved parking facilities could be constructed. These improvements would develop and enhance public access, recreation, and interpretation opportunities within BWER.

The Department wishes to thank the Santa Monica Bay Restoration Commission Governing Board for all their efforts on the Departments behalf. If you have any questions you can contact the Department's delegated representative Randy Rodriguez (randy.rodriguez@wildlife.ca.gov). Thank you for your time and consideration.

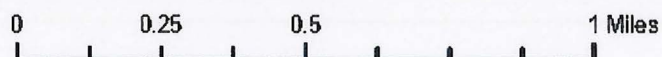
Sincerely,



Richard G. Burg
Environmental Program Manager
South Coast Region



Ballona Wetlands ER Visitor Areas and Information



Data Source: CDFW Data Portal

2019 Ballona Wetlands ER Visitor Counts

	Students Served	Volunteer Hours	Field Trips/Events	Volunteers
Friends of Ballona	7070	7410	143	2964
LA Audubon	2363	1564	44	-
Bay Foundation	-	204	12	102
Totals	9433	9178	199	3066